

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JULIE SU,
ACTING SECRETARY OF LABOR
U.S. DEPARTMENT OF LABOR

Plaintiff,

v.

RBC MANAGEMENT LLC,
ROCKWELL BEER COMPANY LLC, and
RBC BIERGARTEN LLC,

Defendants.

Case No. 4:22-cv-01130-SRC

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff, Julie Su, the Acting Secretary of Labor of the United States Department of Labor, and Defendants RBC Management LLC, Rockwell Beer Company LLC, and RBC Biergarten LLC (collectively “Defendants”) hereby move this Court for entry of the proposed Consent Judgment against Defendants.

In support of this Motion, the parties have jointly consented to the entry of this Judgment. Plaintiff will forward a copy of the proposed Judgment, with the parties’ electronic signatures indicating their consent, to the Court concurrently with this filing, along with a signature page with the original signatures, pursuant to E.D.Mo. L.R 2.11.

WHEREFORE, Defendants having consented to the entry of Judgment against them, Plaintiff respectfully requests that this Court enter the proposed Consent Judgment submitted concurrently with this Motion.

Respectfully submitted,

OFFICE OF THE SOLICITOR

Seema Nanda
Solicitor of Labor

Christine Z. Heri
Regional Solicitor

Evert H. Van Wijk
Associate Regional Solicitor

/s/ Elaine M. Smith
Elaine M. Smith
Trial Attorney
Bar No. 69352 (MO)

U.S. Department of Labor
Office of the Solicitor
2300 Main Street, Suite 10100
Kansas City, MO 64108
Telephone: (816) 285-7262
Fax: (816) 285-7287
E-mail: smith.elaine.m@dol.gov

Attorneys for Plaintiff

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

By: /s/James M. Paul
James M. Paul, #44232 MO
7700 Bonhomme Avenue, Suite 650
St. Louis, MO 63105
Telephone: (314) 802-3935
Facsimile: (314) 802-3960
james.paul@ogletree.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2023, I electronically filed the foregoing *JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT* with the Clerk of the Court CM/ECF system, which sent notification of such filing to the party listed below:

James M. Paul,
7700 Bonhomme Avenue, Suite 650
St. Louis, MO 63105
Telephone: (314) 802-3935
Facsimile: (314) 802-3960
james.paul@ogletree.com

Attorneys for Defendants

s/ Elaine M. Smith
Elaine M. Smith